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***Attorneys for Plaintiffs KAREN LUCIA and
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situated***

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

KAREN LUCIA and JEFFREY LUCIA,
individually, and on behalf of others
similarly situated,

Plaintiffs,

v.

WELLS FARGO BANK, N.A. d/b/a
WELLS FARGO HOME MORTGAGE;
and DOES 1 through 10,

Defendants.

Case No. 3:10-cv-04749-VC

CLASS ACTION

**STIPULATION AND [PROPOSED]
SCHEDULING ORDER**

Hon. Vince Chhabria

PHILLIP R. CORVELLO, individually,
and on behalf of others similarly situated,

Plaintiff,

v.

WELLS FARGO BANK, N.A. d/b/a
WELLS FARGO HOME MORTGAGE
d/b/a AMERICA'S SERVICING
COMPANY,

Defendant.

Case No. 10-cv-05072-VC

AMIRA JACKMON, individually, and on
behalf of others similarly situated,

Plaintiff,

v.

AMERICA'S SERVICING COMPANY
and WELLS FARGO BANK, N.A.,

Defendants.

Case No. 11-cv-03884-VC

TO THE HONORABLE VINCE CHHABRIA, UNITED STATES DISTRICT JUDGE,
PLAINTIFFS KAREN AND JEFFREY LUCIA, PHILLIP R. CORVELLO, AND AMIRA
JACKMON, THEIR COUNSEL OF RECORD, AND ALL OTHER INTERESTED PARTIES:

PLEASE TAKE NOTICE that pursuant to the Court's February 3, 2015 Order, Plaintiffs
Karen and Jeffrey Lucia ("Lucia"), Phillip R. Corvello ("Corvello"), and Amira Jackmon
("Jackmon") (collectively, "Related Plaintiffs"), and Defendant Wells Fargo Bank, N.A. ("Wells
Fargo") (collectively, the "Parties"), by and through their respective counsel, stipulate and agree as
follows:

WHEREAS, the Court held a case management conference in these related actions on
February 3, 2015; and

WHEREAS, the Court has ordered that any motion(s) for class certification to be filed by the
Related Plaintiffs must be heard by the Court by no later than October 29, 2015; and

1 WHEREAS, the Court instructed the Parties in its February 3, 2015 Order to file a joint
2 stipulation setting out such further deadlines as the Parties have agreed upon for completion of
3 discovery and briefing on class certification; and

4 WHEREAS, the Parties have conferred and agreed upon certain deadlines for the completion
5 of discovery and briefing on class certification.

6 **IT IS HEREBY STIPULATED AND AGREED** by the Parties that:

7 1. Counsel for Jackmon will propose consolidated ESI terms and custodians to the
8 existing draft protocol previously negotiated between counsel for Wells Fargo, Lucia, and Corvello
9 by **February 13, 2015**;

10 2. Wells Fargo will make its best effort to respond to such proposal by **February 20,**
11 **2015**;

12 3. The Parties shall finalize one ESI protocol to govern each of the three cases by
13 **February 27, 2015**;

14 4. Wells Fargo will make its best effort to complete rolling ESI productions pursuant to
15 the agreed upon protocol by **April 10, 2015**;¹

16 5. All pre-certification fact discovery, including fact depositions, will be completed by
17 **June 5, 2015**;

18 6. Related Plaintiffs will disclose the identities and curriculum vitae of any experts they
19 intend to use in support of class certification by **June 19, 2015**;²

20 7. Related Plaintiffs will file their motion(s) for class certification by **July 2, 2015**;

21 8. Wells Fargo will disclose the identities and curriculum vitae of any experts it intends
22 to use in support of its opposition(s) to class certification by **August 14, 2015**;³

23
24 ¹ Wells Fargo will produce a privilege log within two weeks of completing its rolling ESI
25 productions.

26 ² Related Plaintiffs agree that they will make such expert(s), if any, available for deposition
27 within three weeks after filing their brief(s) in support of class certification, on a date to be mutually
28 agreed upon by the Parties.

³ Wells Fargo agrees that it will make such expert(s), if any, available for deposition within
three weeks after filing its brief(s) in opposition to class certification, on a date to be mutually agreed
upon by the Parties.

9. Wells Fargo will file its opposition(s) to class certification by **August 28, 2015**;

10. Related Plaintiffs will file their reply(ies) in support of class certification by **October 9, 2015**.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

/s/ Peter B. Fredman

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PHILLIP R. CORVELLO*

/s/ Gretchen Carpenter

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STRANGE & CARPENTER

*Counsel for Plaintiffs
KAREN and JEFFREY LUCIA*

Dated: February 9, 2015

I, IRENE C. FREIDEL, am the ECF User whose ID and password are being used to file this document and, in compliance with Local Rule 5-1(i)(3), hereby attest that all signatories concur with this filing.

/s/ Irene C. Freidel

Irene C. Freidel

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: February 11, 2015



Hon. Vince Chhabria
United States District Judge